

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

<b>In re:</b>	}	
	}	Case No. 1-10-04689
Bruce L. Lebitz, and	}	
Heidi L. Lebitz	}	Chapter 13
	}	
<b>Debtor(s)</b>	}	

**MOTION TO AMEND CHAPTER 13 PLAN AFTER CONFIRMATION**

AND NOW, comes the Debtors, Bruce L. and Heidi L. Lebitz, by and through their attorney, Jennifer A. Hoffman, Attorneys at Law, and respectfully represents as follows:

1. This case was commenced on June 4, 2010, when the Debtors filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Your Debtors filed a Third Amended Chapter 13 Plan which was confirmed.
4. Debtors have elected to surrender collateral to the creditor, and therefore needs to amend the plan accordingly.
5. Your Debtors wish to file their Fourth Amended Plan.

WHEREFORE, the Debtors, Bruce L. and Heidi L. Lebitz, respectfully request this Honorable Court to enter an Order of Court allowing them to Amend their Chapter 13 Plan.

Respectfully submitted,

March 1, 2011  
DATE

/s/ Jennifer A. Hoffman  
Jennifer A. Hoffman, Esquire  
Attorney for the Debtors  
5341 Devonshire Road  
PO Box 6355  
Harrisburg, PA 17112  
(717) 671-5151  
PA I.D. No.: 90769